

201-15608



"Hartwell, Gail"
<ggarvin@dow.com>

09/24/2004 11:17 AM

To: 'chem.rtk@epa.gov'
cc: "Madsen, Steve (SS)" <ssmadsen@dow.com>, "Eisenbrandt, Dave"
<dleisenbrandt@dow.com>, "Kranzfelder, James (JA)" <JKranzfelder@dow.com>,
"Burgert, Linda (LC)" <lburgert@dow.com>, "Clark, Martin (JT)"
<JTCLARK@dow.com>, "Berdasco, Nancy (NM)" <NMBerdasco@dow.com>
Subject: Updated HPV SUBMISSION for 3,6-dichloro-2-trichloromethylpyridine (CASRN:
1817-13-6)

Sir: Enclosed are the HPV documents for 3,4,5,6-tetrachloro-2-pyridine, which we wish to have posted on the EPA website for HPV chemicals. I have enclosed a cover letter, an updated robust summary for PCP as well as the robust summary for 3,4,5,6-tetrachloro-2-pyridine. Please do not hesitate to contact me if you have any questions or comments.

> > <<Updated 3,6-penta cover letter.pdf>> > > <<IUCLID1817-13-6.pdf>> > >
<<Updated IUCLID 2176-62-7.pdf>>

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>

>

> Thanks,
> Gail Garvin
> Environmental Health and Safety
> EH&S Delivery Specialist
> Dow AgroSciences LLC
> 9330 Zionsville Rd.
> Indianapolis, IN 46268
> (317)337-3609
> (317)337-3215 Fax
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>



Updated 3,6-penta cover letter.pdf IUCLID1817-13-6.pdf Updated IUCLID 2176-62-7.pdf

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Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

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Ms. Marianne L. Horinko
Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Dear Ms. Horinko:

CHEMICAL RIGHT TO KNOW – HPV CHALLENGE PROGRAM

On behalf of Dow AgroSciences LLC, I am pleased to notify you that a robust summary, in IUCLID format, for 3,6-dichloro-2-trichloromethylpyridine (CAS No. 1817-13-6), as well as an updated robust summary for 2,3,4,5,6-pentachloropyridine (CAS No. 2176-62-7) have been posted onto the U.S. HPV Chemical Tracking System. All documents are in Adobe Acrobat (pdf) files.

Qualitative structure-activity relationship (QSAR) data comparing 3,6-dichloro-2-trichloromethylpyridine and 2,3,4,5,6-pentachloropyridine, in conjunction with these robust summaries will satisfy the requirements of HPV.

We understand this information will be posted on the Internet for comments for a period of 120 days. Please forward comments to me at the following address:

Ms. Gail M. Garvin
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Sincerely,

Gail M. Garvin
Global Environmental, Health & Safety Specialist
(317) 337-3609
ggarvin@dow.com

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